

20CV9522

JONATHAN BARAM

559 NE 44 ST

BOCA RATON, FLORIDA 33132

310 985 3241

March 24, 2021

Dear Judge Ramos

As I stated in my original request to dismiss the federal sex traffic charge. I have done nothing in the last 14 years that warrants equitable tolling or even prior to the accusation date I have done nothing to warrant equitable tolling. The majority of the complaint is about what Nygard did and his negative reputation which has nothing to do with me at all. I also have no criminal record and have never been handcuffed by any police officer or federal agent. I attached my criminal back round check.

My adversaries are "trying to paint me with the same brush" as Nygard. I am not responsible for Nygard's actions. I don't have a reputation as a bully, billionaire. I own a boutique model management company that

represents Latinas and African American women. We do not represent minors or individuals who are not American citizens. We can not afford the costly fees to becoming a citizen in America. We do not work in the Canadian Market or work with potential Canadian models. That is not our market.

My adversaries lies are becoming pathological. I understand that they can literary write anything in these motions but they are playing games with the civil court system by writing misleading information that is effecting my chances of a dismissal. I also understand that you have to take what they write at "face value." Please consider my position. For the record I never bribed, intimidated or done any witness tampering toward Jane Doe. That's a stupid lie ! I don't even know who Jane Doe is so how can I offer bribes or intimidate her or anyone she is associated with? I also never owned or rented an apartment in Manhattan, New York. I could never afford that and I live in Long Island, New York. I can prove that with my driver's license and tax forms. (Available by request) As far as a conspiracy between Nygard and myself that is impossible because I am not associated with Nygard. I never meet him outside of the Bahamas. I only met

Nygard for collectively for 20 minutes in the physical form.

During discovery my adversaries will have no bank records, no wire transfers, no email, no texts, no phone correspondence, no rape kit & no cell triangular data report to prove their pathologic lies. But they state them like that are facts. Their ridiculous response that I am an international sex trafficker for free (to get in Nygard's good graces) is like saying an international drug dealer would risk dealing drugs for free and no profit. That is not logical. This is another example of my adversaries playing the court system. Also Nygard has absolutely no influence in the hip hop industry which is the industry I book my work in. Nygard dresses women over 40 years of age who respectfully are a much bigger size then our clients.

Nygard is popular for secretaries and other women's positions in corporate environment. My clients are fitness and swimsuit models which is very different body type.

Therefore "The good graces" lie is not logical because of Nygard's and my separate industries. Nygard can do absolutely nothing for me non financially. Nygard does not dress the hip hop industry. Hip hop individuals wear designers like Gucci, Tommy Hilfiger & Louis Vutton which is considered high fashion. Nygard clothing is

considered low budget but makes the women feel extravagant for a cheap price and a good design but not good quality. So no reason to get in Nygard's "good graces" and work for no financial fee.

The new accusations of bribery, witness tampering & intimidation is complete false statement. I am not even being accused of that in the civil lawsuit so how is that valid? The complaint does not say I did any of these things or even provide any basis to think that I did these things. There are no allegations about bribery, witness tampering & intimidation against me in the complaint. There is no reason what so ever for someone think that I was involved in any witness temp, bribery & intimidation. The complaint also alleges that I have not had connection with Nygard since 2007.

I am being sued specifically for:

- Sex traffic one minor (LIE)
- Coconspirator to rape (LIE)
- Drugging minor (LIE)

- Rape (touching jane doe's buttock) (LIE)

It does not mention in the civil lawsuit that I am being sued for bribery, witness tampering, and intimidation directed towards me. Nygard is the only one mentioned to be this bully and mafia boss type figure. That has nothing to do with my 4 accusations. My adversaries know if they left out all the negative stuff about Nygard the press and media would not be interested. Due to the fact that this is a new law firm partnership they are desperate to get mentioned in media with no regard for others.

My adversaries state that her claim against me is revived under the New York child victim's act however it is basic law that a state law can not overturn a federal statute of limitations.

I am requesting for the federal sex traffic charge to be dismissed. Your honor, as an alternative If you don't dismiss the charge can I respectfully request to only allow discovery be limited to the statute of limitations issue at the beginning? That would be more efficient then full discovery.

Thank you for your consideration & understanding

Respectfully

Jonathan Baram

Jonathan Baram

559 NE 44 st

Boca Raton, Florida 33431

310- 985-3241

March 15, 2021

Dear Judge Ramos

During the pre-motion conference call I was never asked about my web site. That is a complete lie. I was asked about Warren & Baram Management LLC. That is not a web site. I never denied control of the web site. That is another lie by my adversaries. I also removed the posting. Those statements I made were true. I filed a complaint with the attorney grievance committee due the horrific actions of my adversaries. The receipt is attached. I am intitled to worn my web site registers, clients and potential clients of my adversaries who are aggressively contacting them and harassing them and my adversaries are telling my clients I am a sex trafficker and coconspirator to rape. This is witness tampering and prevents me from communicating with my clients and future clients.

For the last 2 years my adversaries have been contacting my clients and potential clients to promote their campaign of lies. I have been found guilty in the eyes of the public due to my adversaries. This has interfered with my ability to communicate with potential witnesses. On their press release they labeled me an international sex trafficker, co-conspirator to rape and drugging a minor. For the record I did none of these things. Its impossible because a big hole in their story of lies is I was at Nygard's New York penthouse. As I stated in the past that I only met Nygard in the Bahamas

and no where else. I have no association with Nygard and his clothing company is a completely different market for my clients. Nygard dresses women above 50 years of age with bigger measurements than my clients. We have no reason to do business with him. Nygard also has no influence in our hip hop community. I only attended his birthday and we shot with maxim Magazine there and did not pay for it and that's why we did it because it cost no money.

When I attempted to negotiate the protective order I suggested that we can convert me to a "John Doe" which should satisfy both parties quite nicely.

Lisa Haba yelled " No ! You are a sex trafficker ! "

I am willing to speak with them on this matter. I have full intention on honoring the protective order. Their claim that I wont is another lie. That defeats the whole purpose of the protective order. I just want an even playing field. I requested a Friday phone call to discuss the protective order to try to come to a resolution.

I am requesting that my adversaries remove the witness tampering information about me on their press release. They posted it before I was even served with civil lawsuit to "muddy the waters". Also on the pre conference call Amanat stated that Jane Doe thought she was drugged. This is another example of their deception campaign. Because in the press release it says she was piled with drugs and alcohol from me. (Press Release Attached } They added the word "plied " to make it sound much worse which is mis leading and tampering with potential evidence and witnesses. In the actual complaint that left out the word "plied."

Thank you for your consideration and understanding

Respectfully

Jonathan Baram

Jonathan Baram

559 NE 44 Street

Boca Raton, Florida 33132

Cell 347 972 7011

03/01/21

To Judge Ramos

I respectfully request for the Jane Doe's identity to be public. I am severely limited by not having the help of the public and media help me research my accuser. My advisories can just wait for the phone calls about me. This a direct result of my adversaries promoting a malicious multi-media campaign calling me a sex trafficker of minors and a rapist. Due to the fact that we could not come to an agreement during our phone conversation regarding her identity status. I offered a compromise. My offer was that my identity be amended to a John Doe status everywhere including all documents, online and media outlets. This fits both our objectives of both parties quite nicely.

Lisa D. Haba's exact words were "No ! You are a sex trafficker! "

As a result of these malicious claims I have received many death threats. Respectfully I am intitled for safety for me and my family as well as my accuser. I don't feel comfortable with my address and name out there in public with this negative message and being judged before the verdict by the public. I agree never to make contact with my accuser in any way and nobody associated with me will contact her. My only intention are too keep me and my family to remain safe.

Thank you for your consideration and your understanding

Respectfully

Jonathan Baram

Jonathan Baram

559 NE 44 Street

Boca Raton, Florida 33132

Cell 347 972 7011

02/26/21

To Judge Ramos

I respectfully request for the Federal Sex traffic claim to be dismissed due to the expiration of the statute of limitations. It is clear in the complaint that nothing I did warranted equitable tolling. It is clear that to the extent that if there is a basis of equitable tolling, it's all against Nygard. The majority of the complaint is what Nygard did and his negative reputation which has noting to do with me. There is nothing in the complaint that I did in the last 14 years that warrants equitable tolling. I also have no criminal record and am not a threat to Jane Doe.

Thank you for your consideration and your understanding

Respectfully

Jonathan Baram

Press Release

NYC-based talent agent joins international actress on a growing list of alleged conspirators in accused fashion designer's international sex trafficking ring

NEW YORK – In a court filing in New York on November 11, New York-based “talent agent” Jonathan Baram followed on the heels of Instagram model Suelyn Medeiros in being accused of knowingly and actively recruiting young women for Nygard as part of a sweeping international sex trafficking venture. The lawsuits, filed by DiCello Levitt Gutzler, portend to be the first of many.

“We have dozens of co-conspirators, in several countries, that our investigation has identified. We know the truth and that truth will be told,” said Greg Gutzler, the victims’ attorneys. “Those co-conspirators should come forward now and cooperate with our investigation to help the victims and to hold Nygard and his co-conspirators accountable. Those who attempt to hide will be brought to justice.”

In the most recent filing in New York, **Defendants Jonathan Baram and his company, of enticing Warren & Baram Management LLC, are accused another of Nygard’s victims, who was a 17-year-old girl at the time, to travel to New York in 2017, on the pretense of offering her acting and modeling representation, with knowledge that she would be sex trafficked to Peter Nygard.**

Baram is accused of luring the victim from Canada to his New York apartment, coercing her into posing for nude photos, which he sent to Nygard, and subsequently taking her to Nygard’s penthouse apartment, where he knew that she would be raped. The lawsuit alleges that Nygard Company employees **and Baram plied the victim with alcohol spiked with drugs and encouraged her to drink**, even though they knew she was underaged. The complaint details, how, shortly after Jane Doe was taken into a bedroom to “meet” with Nygard and discuss “modeling,” she lost consciousness. The lawsuit explains that the victim awoke to find Nygard on top of her, sodomizing her, continuing to attack her even as she resisted. After Nygard assaulted the victim, the lawsuit describes how Baram then took the victim back to his apartment, where Baram groped her as she begged him to stop.

**Automatic reply: Fwd: ATTORNEY COMPLAINT
(ATTACHMENTS CORESPONDENCE)**

"AD1-AGC-newcomplaints" [AD1-AGC-newcomplaints@nycourts.gov]

Sent: 2/26/2021 3:41 PM

To: ""Warren & Baram Management"" <jonathan@warrenandbaram.com>

We acknowledge receipt of your complaint.
We will process it as soon as we can.
If you need to contact us, please send an email to
mailto:ad1-agc@nycourts.gov and make reference to your complaint.
Thank you.

Attorney Grievance Committee
Supreme Court, Appellate Division
First Judicial Department
180 Maiden Lane, 17th Floor
New York, New York 10038

MIAMI-DADE COUNTY, FLORIDA

MIAMI -DADE POLICE DEPARTMENT
799 N.W. 81 STREET
MIAMI, FLORIDA 33150-2713



Date: 02-14-2020

To Whom It May Concern:

A name search of the Miami-Dade Police Department (MDPD) arrest records under the name of:

Name: JONATHAN TODD BARAM Race/Sex: W/M
AKA: _____ Date of Birth: 07-05-1973
MDPD Criminal Identification Number: _____

☒ No Local Record☐ Criminal Registration Only/No Local Record☐ Local Felony Arrest Record(s)☐ Copy on File☐ Copy Not on File☐ For Case Disposition Contact: (305) 275-1155**Felony Division**

1351 NW 12 Street

Miami, Florida 33125

☐ Local Misdemeanor Arrest Record(s)☐ Copy on File☐ Copy Not on File☐ For Case Disposition Contact: (305) 275-1155**Misdemeanor Division**

1351 NW 12 Street

Miami, Florida 33125

☐ Local Traffic Arrest Record(s)☐ Copy on File☐ Copy Not on File☐ For Case Disposition Contact: (305) 275-1111**Traffic Division**

1351 NW 12 Street, Room 124

Miami, Florida 33125

☐ Other Local Agency Arrest Record(s)☐ **Civil Division** (305) 275-1155

73 W. Flagler Street

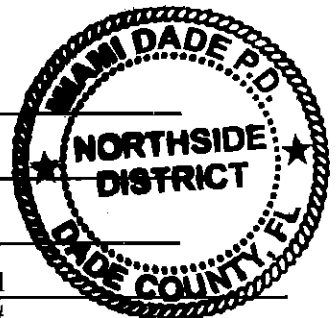
Miami, Florida 33142

Case Numbers:

Comments:

Date: 02-14-2020 Researched by (Name/Title): OFC. J. MARTINEZ 5631
Print and Sign ID/Badge#

Date: 02-14-2020 Prepared by (Name/Title): OFC. J. MARTINEZ 5631
Print and Sign ID/Badge#



NOTE: Not valid unless the seal of the MDPD is affixed. The MDPD is prohibited from disclosing the existence of juvenile criminal history information, as well as records that have been sealed or expunged. Therefore, if "No Local Record" is indicated, there remains the possibility that juvenile, sealed or expunged records may be associated with the above name that cannot be disclosed. There is also the possibility that an adult or juvenile may have been arrested in a jurisdiction other than Miami-Dade County. The Florida Department of Law Enforcement may disclose information related to criminal history for certain licensing and employment purposes as provided by law. They may be contacted at 1-800-342-0820.

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ORIGIN ID:PHKA (310) 227-1344
JONATHAN.TODD BARAM
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ATLANTIC BEACH, NY 11509
UNITED STATES US

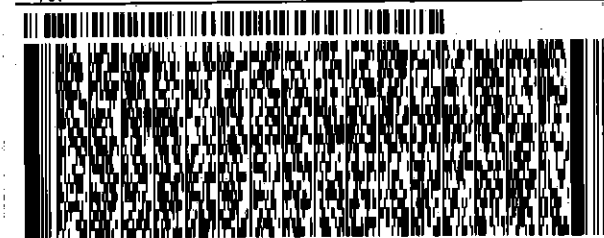
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NEW YORK NY 10007

(212) 806-0186

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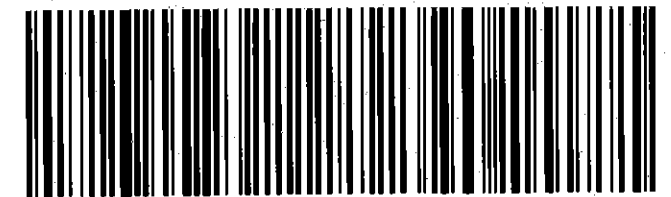
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